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November 6, 2007

The Honorable Sue L. Robinson
United States District Court
For the District of Delaware
844 King Street
Wilmington, DE 19801

Re: Hewlett Packard v. Polaroid Corporation
USDC-D. Del. - C.A. No. 06-738 (SLR)



ATLANTA

AUSTIN

BOSTON

DALLAS

DELAWARE

MUNICH

NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

Dear Judge Robinson:

HP would like to raise the following issues at the discovery conference scheduled for 5:00 pm today:

- (1) Polaroid's production of thousands of irrelevant and nonresponsive documents in its over 7 million page production.
- (2) Polaroid's interrogatory responses, specifically:
 - (a) Polaroid's failure to answer HP interrogatory no. 16, and its failure to identify or produce documents related to interrogatory no. 16.
 - (b) Polaroid's failure to specifically identify documents in response to HP interrogatories 17 and 12.
- (3) Prompt production of Polaroid's agreements with third parties which allow it to distribute photo editing software for free.

Respectfully,

A handwritten signature in black ink, appearing to read 'William J. Marsden, Jr.', with a large, stylized flourish at the end.

William J. Marsden, Jr.
WJM/kxk / 80051210.doc

cc: Jack B. Blumenfeld, Esq. (via email)
Russell E. Levine, Esq. (via email)
Julia Heaney, Esq. (via email)
C. Graham Gerst, Esq. (via email)